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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of
Part 68 of The
Commission's Rules and
Regulations

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RM - 8621

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COMMENTS

BellSouth Telecommunications, Inc. ("BellSouth"),
respectfully submits these Comments in support of the
Petition for Rulemaking filed March 9, 1995, by the
Telecommunications Information Association ("TIA").

TIA proposes initiation of a proceeding to consider
adoption of modifications to Subpart D of Part 68 of the
Commission's rules, 47 C.F.R. § 68.300-.318. TIA states
that the proposed rule modifications would harmonize this
portion of the Commission's terminal equipment registration
rules with comparable rules of the Canadian Terminal
Attachment Program Advisory Committee, for which and to whom
the same harmonizing proposals have been submitted. The
purpose of this harmonization initiative is to eliminate
unnecessary differences in terminal equipment registration
requirements and thereby to promote barrier-free trade
between Canada and the United States consistent with the
spirit of the North American Free Trade Agreement.

BellSouth supports TIA's proposal and, in fact, was
active in the lengthy proposal development process.

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BellSouth believes that consumers will benefit from the greater choice in terminal equipment availability that harmonization of registration requirements may foster.

BellSouth also supports the initiative because it has been undertaken without losing sight of the primary purpose of the Part 68 rules themselves, i.e., protecting the network against potential harm from terminal equipment.¹ Thus, where substantive rule modifications have been proposed, they have been analyzed from the standpoint of potential network harm, rather than solely from a terminal equipment trade perspective. BellSouth is also confident

¹ 47 C.F.R. § 68.1 ("The purpose of the rules and regulations in this part is to provide for uniform standards for the protection of the telephone network from harms caused by the connection of terminal equipment and associated wiring thereto. . . .").

that focus on this primary purpose of the Part 68 rules can be maintained as the Commission develops mechanisms for pursuing continued harmonization over time.

For these reasons, BellSouth supports adoption of a rulemaking proceeding in accordance with TIA's Petition.

Respectfully submitted,

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Draft Date: May 1, 1995

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of May, 1995, serviced all parties to this action with a copy of the foregoing COMMENTS reference to Petition for Rulemaking, RM-8621 by hand delivery or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.


Julia W. Spires

SERVICE LIST RM-8621

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